

EXHIBIT C



July 30, 2024

Re: *In re: Uber Technologies, Inc. Passenger Sexual Assault Litigation*, 23-md-03084-CRB

Counsel,

Plaintiffs propose modifying the Third Party Subpoena directed to Ballard Partners narrowing the Requests for Documents therein as follows:

- ~~1. Please produce all communications with Uber.~~
- ~~2. Please produce all documents exchanged with Uber.~~
3. Please produce ~~all~~ communications exchanged between You and any Regulator relating to or on behalf of Uber **related to key lobbying issues (per provided list).**
4. Please produce ~~all~~ documents exchanged between You and any Regulator relating to or on behalf of Uber **related to key lobbying issues (per provided list).**
5. Please produce ~~all~~ communications exchanged between You and any member of the Media relating to or on behalf of Uber **related to key lobbying issues (per provided list).**
6. Please produce ~~all~~ documents relating in any way to lobbying activities You performed, conducted, or otherwise engaged in which were related to or otherwise done on behalf of Uber **related to key lobbying issues (per provided list).**
7. Please produce ~~all~~ communications relating in any way to lobbying activities You performed, conducted, or otherwise engaged in which were related to or otherwise done on behalf of Uber **related to key lobbying issues (per provided list).**
8. Please produce ~~all~~ documents reflecting the scope of work You were retained to do for Uber, including but not limited to contracts, agreements, and statements of work.
9. Please produce ~~all~~ lobbying disclosures, including any drafts, that relate in any way to your work on behalf of Uber **related to key lobbying issues (per provided list).**
10. Please produce ~~all~~ documents reflecting payments or contributions made to You by Uber, including but not limited to any invoices, letters, canceled checks, or accounting letters **related to key lobbying issues (per provided list).**
11. Please produce ~~any~~ model legislation You drafted, reviewed, revised, prepared, or obtained on behalf of Uber or otherwise in connection with any lobbying activities performed on behalf of Uber **related to key lobbying issues (per provided list).**
12. Please produce ~~any~~ studies you drafted, commissioned, reviewed, revised, prepared, or otherwise obtained in connection with any lobbying activities performed on behalf of Uber **related to key lobbying issues (per provided list).**
- ~~13. Please produce all materials related to the classification of Uber as a transportation network company. You drafted, commissioned, reviewed, revised, prepared, or otherwise obtained in connection with any lobbying activities performed on behalf of Uber.~~
- ~~14. Please produce all materials related to the classification of Uber as a common carrier that You drafted, commissioned, reviewed, revised, prepared, or otherwise obtained in connection with any lobbying activities performed on behalf of Uber.~~



- ~~15. Please produce all materials related to the classification of Uber drivers as employees that You drafted, commissioned, reviewed, revised, prepared, or otherwise obtained in connection with any lobbying activities performed on behalf of Uber.~~
- ~~16. Please produce all materials related to the classification of Uber drivers as independent contractors that You drafted, commissioned, reviewed, revised, prepared, or otherwise obtained in connection with any lobbying activities performed on behalf of Uber.~~
- ~~17. Please produce all materials related to sexual assault or sexual misconduct which You drafted, commissioned, reviewed, revised, prepared, or otherwise obtained in connection with any lobbying activities performed on behalf of Uber.~~

Key Lobbying Issues: (a) classification of rideshare drivers as independent contractors or employees; (b) classification of rideshare companies as "transportation network companies" (TNCs); (c) background check requirements for rideshare drivers, including the use of biometric or fingerprint screening; and (d) sexual assault.

Please let us know if your position has changed in light of this proposal or if Plaintiffs should plan on filing a Motion to Compel. Plaintiffs remain happy to meet and confer. If we do not hear from you within one week, we will assume that your position has not changed and will plan to file a Motion to Compel in the U.S. District Court for the Northern District of California.

Sincerely,

Sam Hoefs
Marlene Goldenberg

Counsel for Plaintiffs



August 21, 2024

Re: Amended Proposal to Ballard Partners

Counsel,

Please see the amended proposal to modify the subpoena to Ballard Partners:

- ~~1. Please produce all communications with Uber.~~
- ~~2. Please produce all documents exchanged with Uber.~~
3. Please produce ~~all~~ communications exchanged between You and any Regulator relating to or on behalf of Uber **related to key lobbying issues (per provided list).**
4. Please produce ~~all~~ documents exchanged between You and any Regulator relating to or on behalf of Uber **related to key lobbying issues (per provided list).**
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- ~~13. Please produce all materials related to the classification of Uber as a transportation network company. You drafted, commissioned, reviewed, revised, prepared, or otherwise obtained in connection with any lobbying activities performed on behalf of Uber.~~
- ~~14. Please produce all materials related to the classification of Uber as a common carrier that You drafted, commissioned, reviewed, revised, prepared, or otherwise~~



~~obtained in connection with any lobbying activities performed on behalf of Uber.~~

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16. ~~Please produce all materials related to the classification of Uber drivers as independent contractors that You drafted, commissioned, reviewed, revised, prepared, or otherwise obtained in connection with any lobbying activities performed on behalf of Uber.~~
17. ~~Please produce all materials related to sexual assault or sexual misconduct which You drafted, commissioned, reviewed, revised, prepared, or otherwise obtained in connection with any lobbying activities performed on behalf of Uber.~~

Key Lobbying Issues: (a) classification of rideshare drivers as independent contractors or employees; (b) classification of rideshare companies as “transportation network companies” (TNCs); (c) background check requirements for rideshare drivers, including the use of biometric or fingerprint screening; and (d) sexual assault. **These Key Lobbying Issues shall be construed to exclude tax documents and communications.**

Sincerely,

Sam Hoefs